

REMARKS

Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested. Claims 1 and 13 have been amended. No claims have been canceled or added. Claims 1-24 are currently pending in the application.

Claim Rejection - 35 U.S.C. §112

In the Final Office Action, the Examiner rejected claims 1-24 under 35 U.S.C. §112, second paragraph, as being indefinite. Specifically, the Examiner alleged that the term "approximates" recited in claims 1 and 13 is indefinite (not clear what the meets and bounds are). While Applicant disagrees with this allegation, Applicant has nonetheless, in the interest of furthering prosecution, amended claims 1 and 13 to recite "such that said result document comprises said one or more patterns". Applicant believes that this amendment makes it clear what is meant by the term "approximates". Hence, withdrawal of this rejection is respectfully requested.

Claim Rejections – 35 U.S.C. § 102(e)

In the Final Office Action, the Examiner rejected Claims 1, 2, 4-14, and 16-24 under 35 U.S.C. § 102(e) as being anticipated by Sundaresan (U.S. Patent No. 6,487,566). This rejection is respectfully traversed.

Independent claim 1

With regard to independent claim 1, there is recited:

A computer-implemented method for generating a transformation document, comprising:  
analyzing a target document, said target document comprising one or more patterns; and  
automatically generating, based at least upon said target document, a transformation document which, when processed in conjunction with a source document, causes said source document to be transformed into a result document that at least approximates said target document such that said result document comprises said one or more patterns (emphasis added).

Claim 1 provides an advantageous method for automatically generating a transformation document. According to claim 1, a computer-implemented method analyzes a target document and automatically generates, based upon that target document, a transformation document that can be used to transform other documents into result documents that at least approximate the target document. Traditionally, the transformation documents were produced manually; however, with the method of claim 1, these transformation documents can now be generated automatically based upon a target document.

Such a method is neither disclosed nor suggested by Sundaresan. Instead, Sundaresan discloses a method for transforming a source XML document into a result XML document. More specifically, in Sundaresan, a set of rule specifications 114 (Fig. 1) are provided. Based on the rule specifications, Java class specifications 116 are created. When instantiated, the Java class specifications 116 give rise to a set of transformation components 118, 120, 122 that make up a web daemon 108. The set of transformation components are then applied to an input XML document 124 to derive an

output XML document 126. Col. 5, lines 41-50. In this manner, a result XML document 126 is derived by transforming a source XML document 124.

While Sundaresan addresses the generally similar subject matter of document transformations, it should be noted that Sundaresan approaches the subject matter from a very different angle than that of claim 1. As discussed above, Sundaresan teaches a method in which, given a set of rule specifications and a source XML document, a result XML document is derived. Thus, Sundaresan starts with the rule specifications and the source XML document, and ends with the result XML document. In sharp contrast, the method of claim 1 discloses a somewhat reverse process in which a target document (which may be viewed as a desired result document) is provided. Based on the target document, a transformation document is automatically generated. Once generated, the transformation document can be processed with a source document to derive a result document that approximates the target document. Thus, in claim 1, the method starts with a target (desired result) document, and ends with a transformation document. From this discussion, it is clear that the methods are very different. Nowhere in Sundaresan is it disclosed or suggested that a transformation document be automatically generated based upon a target or desired result document.

In rejecting claim 1, the Examiner stated:

Regarding claims 1 and 13, Sundaresan discloses a computer system and method for generating a transformation document comprising: (fig. 1, 106)  
analyzing a target document; and (fig. 1, item 124)  
automatically generating, based at least upon said target document, a transformation document (fig. 1, item 108), said transformation document capable

of being processed in conjunction with a source document (fig. 1, item 112) to transform said source document into a result document (fig. 1, item 126).

From this excerpt, it is clear that the Examiner is contending the following: (1) the XML input 124 of Sundaresan is the target document of claim 1; (2) the web daemon 108 is the transformation document of claim 1; (3) the web daemon 108 is automatically generated based upon the XML input 124; (4) the pre-processing component 112 is the source document of claim 1; (5) the XML output 126 is the result document of claim 1; and (6) the web daemon 108 is capable of being processed in conjunction with the pre-processing component 112 to transform the pre-processing component 112 into the XML output 126. Applicant respectfully disagrees with these contentions.

First of all, it should be noted that the web daemon 108 can in no way be interpreted as a "document". Rather, it is a collection of objects that is instantiated at run time to perform a transformation function. Given that the web daemon 108 is a collection of functional components, Applicant cannot see how it can be interpreted as a "transformation document" as that term is used in claim 1.

Even if the web daemon 108 could be interpreted as a transformation document, it is in no way automatically generated based upon the XML input 124, as contended by the Examiner. Rather than being generated based upon the XML input 124, the web daemon 108 is applied to the XML input 124 to transform the XML input 124 into the XML output 126. In Sundaresan, by the time the XML input 124 is provided to the system, the web daemon 108 is already up and running (i.e. existing). Thus, the web daemon 108 could not possibly be generated based upon the XML input 124. Overall, there is no teaching or suggestion whatsoever in Sundaresan that the web daemon 108 is generated based upon the XML input 124.

Another point to note is that the pre-processing component 112 of Sundaresan (the alleged source document) cannot be processed in conjunction with the web daemon 108 (the alleged transformation document) to produce the XML output 126 (the alleged result document). In Sundaresan, the pre-processing component 112 is used to derive the Java specifications 116, which in turn, are used to give rise to the web daemon 108. Thus, rather than being processed in conjunction with the web daemon 108, the pre-processing component 112 is used to give rise to the web daemon 108. Nowhere in Sundaresan is it disclosed or suggested that the pre-processing component 112 be processed in conjunction with the web daemon 108. In fact, if this were done, the result would not in any way resemble the XML output 126 (the alleged result document).

As argued above, Sundaresan as interpreted by the Examiner fails to disclose or suggest several aspects of claim 1. Consequently, Applicant respectfully submits that claim 1 is patentable over Sundaresan.

Applicant further submits that dependent claims 2, and 4-12, which depend from claim 1 and which recite further advantageous aspects of the invention, are likewise patentable over Sundaresan for at least the reasons given above in connection with claim 1.

Claims 13, 14, and 16-24 include limitations similar to claims 1, 2, and 4-12, except in the context of computer-readable media. It is therefore respectfully submitted that claims 13, 14, and 16-24 are patentable over Sundaresan for at least the reasons given above with respect to claims 1, 2, and 4-12.

#### Claim Rejections – 35 U.S.C. §103(a)

In the Final Office Action, the Examiner rejected claims 3 and 15 under 35 U.S.C. §103(a) as being unpatentable over Sundaresan in view of Nasr (U.S. Patent No. 6,263,332). This rejection is respectfully traversed.

Like Sundaresan, Nasr discloses a method for applying queries and transformation rules to source documents to derive result documents. More specifically, Nasr teaches “retrieving information in a first markup language through a query engine and presenting the information in any required markup language. A user inputs a query and may invoke a number of transformation sequences,” which “contain a markup language pattern and an action, which may include transforming the tags” (Abstract).

The Examiner relies on Nasr to show that the transformation document of claim 1 is an XSLT document as recited in claim 3. For the sake of argument, it will be assumed that Nasr discloses the subject matter as contended by the Examiner. Even if this were true, however, the combination of Sundaresan and Nasr still would not produce the method of claim 3. As argued above in connection with claim 1 (from which claim 3 depends), Sundaresan fails to disclose or suggest a number of aspects of claim 1. Nasr also fails to disclose or suggest these aspects. Thus, even if the references were combined (assuming for the sake of argument that it would have been obvious to combine the references), they still would not disclose every element of claim 3. Thus, Applicant submits that claim 3 is patentable over Sundaresan and Nasr.

Claim 15 includes limitations similar to claim 3, except in the context of computer-readable media. It is therefore respectfully submitted that claim 15 is patentable over Sundaresan and Nasr for at least the reasons given above with respect to claim 3.



Conclusion

For the reasons given above, Applicant submits that the pending claims are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all pending claims is respectfully solicited.

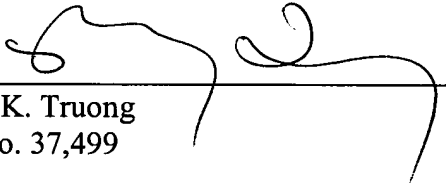
The Examiner is invited to telephone the undersigned at (408) 414-1080 to discuss any issue that may advance prosecution.

No fee is believed to be due specifically in connection with this Reply. The Commissioner is authorized to charge any fee that may be due in connection with this Reply to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

Dated: February 4, 2005

  
Bobby K. Truong  
Reg. No. 37,499

2055 Gateway Place, Suite 550  
San Jose, California 95110-1089  
Telephone No.: (408) 414-1080 ext. 234  
Facsimile No.: (408) 414-1076

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450.

on February 4, 2005  
(Date)

by 

(Signature)